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Attorneys for Individual Butte Fire, North Bay Fires,
And Camp Fire Victim Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**JOINDER TO OMNIBUS OBJECTIONS
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS (SUBSTANTIVE)
TO CLAIMS FILED BY THE
DEPARTMENT OF HOMELAND
SECURITY/FEDERAL EMERGENCY
MANAGEMENT AGENCY (CLAIMS
NOS. 59692, 59734 & 59783) AND TO
CLAIMS FILED BY CALIFORNIA
GOVERNOR'S OFFICE OF**

1 **All papers shall be filed in the Lead Case,*
2 *No. 19-30088 (DM)*

**EMERGENCY SERVICES (CLAIM
NOS. 87748, 87754, & 87755)**

Date: February 26, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Re: Docket Nos. 4943, 5096, 5319, 5320

1 Individual Butte Fire, North Bay Fires and Camp Fire Victim Claimants (the “**Fire Victims**”),
2 in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company,
3 as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) hereby support and join
4 the following objections filed by the Official Committee of Tort Claimants (the “**TCC**”): (i) *Omnibus*
5 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by the*
6 *Department of Homeland Security/Federal Emergency Management Agency (Claim Nos. 59692,*
7 *59734 & 59783) [Dkt. No. 4943] (the “**TCC FEMA Objection**”); (ii) *Supplement To Omnibus*
8 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by the*
9 *Department of Homeland Security/Federal Emergency Management Agency (Claim Nos. 59692,*
10 *59734 & 59783) [Dkt. No. 5319] (the “**TCC Supplemental FEMA Objection**”) (iii) *Omnibus*
11 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by California*
12 *Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5096] (the*
13 *“**TCC Cal OES Objection**”); and (iv) *Supplement to Omnibus Objection of the Official Committee*
14 *of Tort Claimants (Substantive) to Claims Filed by California Governor’s Office of Emergency*
15 *Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5320] (the “**TCC Supplemental Cal OES***
16 ***Objection,**” and together with the TCC FEMA Objection, the TCC Supplemental FEMA Objection,*
17 *and the TCC Cal OES Objection, the “**Objections**”). The Fire Victims also hereby support and join*
18 *in the additional arguments stated in the Joinder of Fire Claimants in TCC’s Objections to Claims by*
19 *FEMA and Cal OES filed by Thomas Tosdal, Esq., on behalf of his clients.****

20 **JOINDER**

21 Pursuant to Section 502(b)(1) of the Bankruptcy Code, a claim is not allowed if the claim “is
22 unenforceable against the debtor . . . under any . . . applicable law.” 11 U.S.C. § 502(b)(1). The Fire
23 Victims support and join in all arguments asserted in the Objections.

24 The Fire Victims reserve all rights to be heard before the Court in connection with the
25 Objections (and any joinders thereto), to amend, supplement, or otherwise modify this Joinder prior
26 to or during the preliminary hearing on the Objections, and to assert such other and further objections
27 prior to the final adjudication of the matter.

1 For the reasons set forth in the Objections, the Fire Victims respectfully request that the Court
2 enter an order disallowing and expunging the FEMA Claims and the Cal OES Claims identified in the
3 Objections.

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5 DATED: February 11, 2020

Respectfully submitted,

6 **COREY, LUZAICH, DE GHETALDI & RIDDLE LLP**

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9 By: _____

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